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*Attorneys for Plaintiff Parnell Jay Fair*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

PARNELL JAY FAIR, individually,

CASE NO: 2:20-cv-01841-JCM-BNW

**Plaintiff,**

V.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; LUKAS TURLEY, individually;  
ALEXANDER RYNDAK, individually;  
UNIVERSITY MEDICAL CENTER, D/B/A  
UNIVERSITY MEDICAL CENTER OF  
SOUTHERN NEVADA, a Nevada Governmental  
Entity; CHASITY TRAVIS, individually; JENNA  
A. DOUD, individually; JESSE WELLS,  
individually; CASEY ALLEN ROEHR,  
individually; SHAIN HOWARD, individually;  
SCOTT KEVIN LEE, individually; BROCK T.  
WENTZ, individually; DOES I – X, and ROES I  
– X, inclusive

### Defendants.

**STIPULATION AND**  
**ORDER TO EXTEND PLAINTIFF'S**  
**DEADLINE TO FILE HIS RESPONSE TO**  
**DEFENDANT CASEY ALLEN ROEHR,**  
**M.D.'S MOTION TO DISMISS (ECF NO.**  
**57) AND JOINDERS THERETO**

**(First Request)**

WHEREAS Defendant Casey Allen Roehr, M.D. filed his Motion to Dismiss (“Motion”) on January 11, 2021 (ECF No. 57) in response to Plaintiff’s Amended Complaint (ECF No. 46).

WHEREAS Defendants University Medical Center d/b/a University Medical Center of Southern Nevada (“UMC”) and Chasity Travis filed their Joinder to Defendant Casey Allen Roehr’s Motion to Dismiss on January 20, 2021 (ECF No. 65).

1           WHEREAS Defendant Brock T. Wentz, D.O. filed his Joinder to Defendant Casey Allen  
2 Roehr's Motion to Dismiss on January 19, 2021 (ECF No. 64).

3           WHEREAS Defendant Shain Howard, D.O. filed his Joinder to Defendant Casey Allen  
4 Roehr's Motion to Dismiss on January 14, 2021 (ECF No. 63).

5           WHEREAS Defendants Jenna Doud and Jesse Wells filed their Joinder to Defendant Casey  
6 Allen Roehr's Motion to Dismiss on January 14, 2021 (ECF No. 61).

7           Pursuant to Local Rule IA 6-1(a), the Parties hereby stipulate and agree to extend the  
8 deadline for Plaintiff to file his response to Defendant Casey Allen Roehr's Motion and Joinders  
9 thereto. The current deadline for Plaintiff to respond to Defendant Casey Allen Roehr's Motion is  
10 **January 25, 2021**. The new deadline for Plaintiff to respond to Defendant Casey Allen Roehr's  
11 Motion will be **February 4, 2021**.

12           Good cause exists for the extension because Plaintiff requires a thorough and thoughtful  
13 response. Plaintiff's counsel currently is under competing deadlines, including preparation for an  
14 upcoming trial, depositions, and briefing deadlines. As an office of only three (3) attorneys, these  
15 competing deadlines put additional strain on counsel to ensure briefing is thoroughly and  
16 thoughtfully compiled. Moreover, one of the attorneys in the plaintiff's office has recently returned  
17 from a two-week quarantine and recovery from COVID-19. As a result, the other two attorneys in  
18 the office had to cover other deadlines. Finally, the office is typically staffed with an additional law  
19 clerk who has recently left the office to extern for the United States District Court leaving the office  
20 temporarily shorthanded.

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22           ///

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1           This extension is the first request for an extension and is not submitted for the purpose of  
2 delay.

3           **IT IS SO STIPULATED AND AGREED.**

4           DATED this 22<sup>nd</sup> day of January, 2021.

5           LAGOMARSINO LAW

6           /s/ Daven P. Cameron

7           Andre M. Lagomarsino, Esq. (#6711)  
8           Daven P. Cameron, Esq. (#14179)  
9           3005 West Horizon Ridge Parkway, #241  
Henderson, Nevada 89052  
10          Attorneys for Plaintiff Parnell Jay Fair

11          DATED this 22<sup>nd</sup> day of January, 2021.

12          KAEMPFER CROWELL

13           /s/ Ryan W. Daniels

14           Lyssa S. Anderson, Esq.  
15           Ryan W. Daniels, Esq.  
16           1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135  
17          Attorneys for Defendants LVMPD, Lukas Turley,  
and Alexander Ryndak

18          DATED this 22<sup>nd</sup> day of January, 2021.

19          McBRIDE HALL

20           /s/ Sean M. Kelly

21           Robert C. McBride, Esq.  
22           Sean M. Kelly, Esq.  
23           8329 West Sunset Road, Suite 260  
Las Vegas, Nevada 89113  
24          Attorney for Defendant Jenna Doud  
and Jesse Wells

25           ///

26           ///

27          DATED this 22<sup>nd</sup> day of January, 2021.

28          LEWIS BRISBOIS BISGAARD & SMITH LLP

29           /s/ Melanie L. Thomas

30           Keith A. Weaver, Esq.  
31           Melanie L. Thomas, Esq.  
32           6385 South Rainbow Blvd. Suite 600  
Las Vegas, Nevada 89118  
33          Attorneys for Defendant Brock T. Wentz, M.D.

34          DATED this 22<sup>nd</sup> day of January, 2021.

35          PITEGOFF LAW OFFICE

36           /s/ Jeffrey I. Pitegoff

37           Jeffrey I. Pitegoff, Esq.  
38           911 Buffalo Drive, Suite 201  
Las Vegas, Nevada 89128  
39          Attorney for Defendants University Medical  
Center and Chasity Travis

40          DATED this 22<sup>nd</sup> day of January, 2021.

41          JOHN H. COTTON & ASSOCIATES, LTD.

42           /s/ Brad J. Shipley

43           John H. Cotton, Esq.  
44           Brad J. Shipley, Esq.  
45           7900 West Sahara Avenue, Suite 200  
Las Vegas, Nevada 89117  
46          Attorneys for Defendant Scott Kevin Lee

1 DATED this 22<sup>nd</sup> day of January, 2021.

2 LEWIS BRISBOIS BISGAARD & SMITH LLP

3 /s/ Katherine J. Gordon

4 Katherine J. Gordon, Esq.  
5 6385 South Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
6 Attorney for Dr. Casey Roehr, M.D.

DATED this 22<sup>nd</sup> day of January, 2021.

LAURIA TOKUNAGA GATES & LINN, LLP

/s/ Anthony D. Lauria

Anthony D. Lauria, Esq.  
601 South Seventh Street  
Las Vegas, Nevada 89101  
Attorney for Defendant Shain Howard

7  
8 **IT IS SO ORDERED.**

9   
10 UNITED STATES DISTRICT COURT JUDGE

11 DATED: February 26, 2021

12 LAGOMARSINO LAW

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14 Telephone (702) 383-2864 Facsimile (702) 383-0065

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